


FEB 07 2013

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

JULIA G. DUDLEY, CLERK  
BY:   
DEPUTY CLERK

UNITED STATES OF AMERICA	)	<b>INDICTMENT</b>
	)	
v.	)	<b>Criminal No.</b> <u>7:13CR00013</u>
	)	
WILLIAM A. WHITE	)	<u>In violation of:</u>
	)	
	)	Title 18, U.S.C. §875(b)
	)	Title 18, U.S.C. §2

**COUNT ONE THROUGH FOUR**  
**(Interstate Communication Of A Threat To Injure)**

A. Introduction

1. On April 30, 2011 Defendant WILLIAM A. WHITE was released from the Bureau of Prisons and began serving three years of Supervised Release. WHITE was to appear on May 14, 2012 in United District Court for the Western District of Virginia for a sentencing hearing. The Court was notified that on or about May 11, 2012, WHITE had left the Western District of Virginia without prior approval of his Probation Officer. WHITE was eventually apprehended on June 12, 2012, in Mexico. He was deported and returned to the United States on June 13, 2012. While in Mexico, WHITE obtained and attempted to obtain money to fund his fugitive lifestyle.

2. Prior to the Defendant's departure, MW entered into an agreement with WHITE whereby she agreed to pay WHITE Defendant \$400 per month in "alimony." Although the agreement was never reduced to writing, MW started making \$400 per month payments in March of 2012. Per WHITE's instructions, MW mailed the payments to a post office box in Roanoke,

Virginia. Upon learning that WHITE had fled the Western District of Virginia, MW stopped payment on one check and did not make any other payments.

3. WHITE asked SG to accompany him to Nogales, Arizona where WHITE crossed the border into Mexico. After WHITE entered Mexico, SG drove back to Roanoke. She had agreed to pick up WHITE's mail at his Roanoke Post Office box and transmit all funds to WHITE in Mexico. WHITE maintained contact with SG by phone and multiple times requested that SG locate someone to convey threatening communications to MW in order to convince MW to make "alimony" payments, including the statements listed below:

DATE	CONTENT
June 2, 2012	That's pathetic. She works at a f***** bank. As far as I'm, concerned you can walk in there and tell her to give you the f***** money. I'll be honest though if somebody were to just go there and say look you need to pay the F***** money or you're gonna get f***** up I think she, she, she would break immediately. You'd think, what it is she thinks I'm bull***** her and as long as she thinks I'm bull***** her then nothing's going to happen. She ain't going to do anything.
June 3, 2012	Honestly it is really easy right now you just need to find somebody to get on the phone and pick up, pick up a throw phone and call her up and say you're gonna pay the f***** money or I am going f*** you up." That's the easy part. The next part is backing it up.
June 4, 2012	Alright, well it's kind of important. I mean literally I don't care if you take a throw phone and drive around the slums of Chapman Avenue until you find somebody willing to scream obscenities in the phone. I'm not kidding you can probably pay somebody ten bucks to just scream some f***** obscenities into the phone and get what she, get five hundred bucks out of her, but I do need somebody to lean on her and get that money so if you can't do it I got to talk to somebody else up there.

B. Extortion Communications

1. On or about the dates listed below, the defendant, **WILLIAM A. WHITE**, knowingly and with intent to extort money and other thing of value from MW, did transmit by email in interstate and foreign commerce from Mexico to Staunton, Virginia, which is within the Western District of Virginia, email communications to MW and the communication contained a threat to injure MW as detailed below:

<u>COUNT</u>	<u>DATE</u>	<u>THREAT</u>
ONE	May 27, 2012	I've had an offer from a loan shark in Roanoke to split the money you owe me 50/50. He will send someone to beat your ass if you don't pay, and I will give him half for that service. I would rather we found some way to peacefully work things out so I had continuing contact with my daughter and you faced up to your obligations to me. If I don't hear from you soon, I will just let the guy know you owe me \$500 and let him take care of it. If you won't face up to what you've done, someone has to hold you accountable.
TWO	May 28, 2012	If I were to allow myself to be arrested, you have proven that you will take her from me forever and that the federal government will assist you with this. So, rather than be arrested, I will remain free, and if you attempt you are going to have the living s*** beat out of you-to start with. You don't seem to have any sense of right or wrong and only seem to respond to the threat of legal or physical force. The things you do upset a lot of people, and I have a lot of friends who think nothing of taking out on you the things you have done to me.
THREE	May 29, 2012	Later on someone will be in touch with you. You owe me two alimony payments and \$85 in fees, which is being called \$500. I would strongly recommend you have the \$500 when you are

contacted-or you will probably be hospitalized.

FOUR

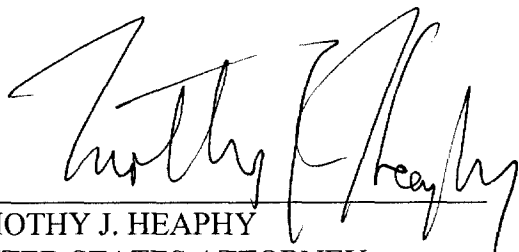
June 7, 2012

Subject: One Last Chance to avoid an incident

I would very much like to avoid an incident in which something violent potentially happens to you around the baby. Will you make some agreement to settle the issues with the money and with my access to my daughter? If I don't hear from you within 24 hours, then what follows will be on you-I've done everything I can to work this out peacefully.  
Bill

All in violation of Title 18, United States Code, Section 875(b) and 2.

A TRUE BILL, this 7<sup>th</sup> day of February, 2013.

  
TIMOTHY J. HEAPHY  
UNITED STATES ATTORNEY

  
FOREPERSON